

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF NORTH CAROLINA  
CHARLOTTE DIVISION  
Civil Action No: 3:17-cv-7

GLENDAY FAY HOWELL,

Plaintiff,

v.

SHANNON LANE AND SREE HOTELS,

Defendants.

**NOTICE OF REMOVAL**

Defendants Shannon Lane and SREE Hotels, LLC<sup>1</sup> (“Defendants”) by and through the undersigned counsel and pursuant to 28 U.S.C. §§ 1331 and 1446, give notice that they have removed from the General Court of Justice, Superior Court Division for Mecklenburg County, North Carolina, the action entitled Glenda Fay Howell v. Shannon Lane and Sree Hotels, Case No. 16-CVS-21764, to this Court, the United States District Court for the Western District of North Carolina, and states as follows:

1. Defendant Shannon Lane is a resident of the State of North Carolina.
2. Defendant SREE Hotels, LLC is a North Carolina limited liability company with its principal place of business in Charlotte, North Carolina.
3. Plaintiff is a resident of the State of North Carolina.
4. On December 2, 2016, Plaintiff filed this action in the General Court of Justice, Superior Court Division for Mecklenburg County, North Carolina. Defendants were served with the Summons and Complaint on December 8, 2016. This Notice of Removal has been timely filed within thirty (30) days after service of the initial Complaint. *See* 28 U.S.C. § 1446(b).

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<sup>1</sup> Defendant “Sree Hotels” is legally registered as SREE Hotels, LLC.

5. In the Complaint, Plaintiff purports to allege a claim for discrimination in violation of Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. § 2000e *et seq.* (“Title VII”). *See* Compl., ¶ 4.B.

6. This action is removable pursuant to 28 U.S.C. § 1331, because Plaintiff’s cause of action arises under the Constitution, treaties or laws of the United States.

7. In accordance with 28 U.S.C. § 1446(a), attached hereto as **Exhibit 1** are copies of all process, pleadings and orders served upon Defendants in this action and/or filed in the General Court of Justice, Superior Court Division, Mecklenburg County, North Carolina, Case No. 16-CVS-21764.

8. This Notice of Removal was served upon all parties and is being filed with the Clerk of the General Court of Justice, Superior Court Division for Mecklenburg County, North Carolina, contemporaneously with this filing. *See* 28 U.S.C. § 1446(d).

WHEREFORE, Defendants pray that the above-referenced action now pending in the General Court of Justice, Superior Court Division for Mecklenburg County, North Carolina, Case No. 16-CVS-21764, be removed therefrom in its entirety to this Court, as provided by law, and, pursuant to 28 U.S.C. § 1446(d), that the Mecklenburg County Superior Court proceed no further unless and until the case is remanded.

This 6th day of January, 2017.

s/ Stacy K. Wood  
Stacy K. Wood, N.C. Bar No. 21768  
[stacywood@parkerpoe.com](mailto:stacywood@parkerpoe.com)  
s/Sarah J. Douglas  
Sarah J. Douglas, N.C. Bar No. 47839  
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*Attorneys for Defendants*

### **CERTIFICATE OF SERVICE**

I hereby certify that on this date a true and correct copy of the foregoing “*Notice of Removal*” was served by depositing a copy thereof in the United States mail via Certified Mail, Return Receipt Requested, postage prepaid and addressed as follows:

Glenda Fay Howell  
1933 Milton Road  
Apartment 2  
Charlotte, North Carolina 28215

This 6th day of January, 2017.

s/ Stacy K. Wood  
Stacy K. Wood, N.C. Bar No. 21768  
[stacywood@parkerpoe.com](mailto:stacywood@parkerpoe.com)  
s/Sarah J. Douglas  
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*Attorneys for Defendants*